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November 16, 2023

By ECF

Hon. Taryn A. Merkl  
United States Magistrate Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Sylla et al., v. Amazon Labor Union et al.  
Civil Case No. 23- 05261 (AMD)  
Request for A Pre-Motion Conference On Motion to Disqualify

Dear Magistrate Merkl:

This Court scheduled a response to the Request for A Pre-Motion Conference on a Motion to Disqualify for November 20, 2023. We are ready to do that, but we are concerned that if we properly respond, we will be publicly exposing matters which I believe that led to the request by the defendant union to attempt mediation, and to their request that any amended pleadings and related motions be filed under seal.

The parties will have (I hope) their first settlement discussion later today. I think that public litigation of their motion to disqualify will undermine those discussions, and, worse yet, undermine this very fragile, about to collapse union. In the spirit of not stoking the flames of war in the midst of settlement talks that the response to the Request for a Pre-Motion Conference be adjourned until after we see how the mediation now set for December 8 turn out.

Thank you for your consideration.

Respectfully submitted,

/s/ *Arthur Z. Schwartz*

Arthur Z. Schwartz

cc: Jeanie Mirer, Attorney for Defendants